



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

May 1, 2019

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *Bonner v. Department of Defense et al.*, No. 17 Civ. 9378 (VEC)
Bonner v. Central Intelligence Agency, No. 18 Civ. 1315 (VEC)
Monthly Status Report

Dear Judge Caproni:

We write respectfully to report on the status of the above-referenced FOIA actions. In an effort to narrow the issues for further litigation, the parties are currently in the process of meeting and conferring regarding the CIA's withholdings and plaintiff's anticipated challenges. Accordingly, we respectfully propose that the parties provide the Court with a further status update by Monday, June 3, 2019.

We thank the Court for its consideration of this report.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: /s/ Christopher Connolly
SARAH S. NORMAND
CHRISTOPHER CONNOLLY
Tel.: (212) 637-2709/2761

Counsel for Defendants

MEDIA FREEDOM AND
INFORMATION
ACCESS CLINIC

By: /s/ David A. Schulz
David A. Schulz
Tel: (212) 850-6103

Counsel for Plaintiff Raymond Bonner